UNITED STATES DISTRICT COURT
NORTHERN DISTRICT COURT OF NEW YORK

JOHN GORMAN,

Plaintiff,

Civil Case No.: 1:14-cv-434

-against-

RENSSELAER COUNTY, ET. AL

Defendants.

PLEASE TAKE NOTICE that upon the Declaration of Patrick Sorsby, dated March 3rd, 2016, and upon the exhibit papers annexed thereto, the accompanying memorandum of law, and all other pleadings and proceedings in this matter, Plaintiff JOHN GORMAN, by and through his attorney The Law Office of Patrick Sorsby PLLC, will move this Court before Honorable Magistrate Daniel J. Stewart on April 2, 2016 , or as soon thereafter as counsel may be heard, at the U.S. District Courthouse for the Northern District of New York, located at the James T. Foley United States Courthouse, 445 Broadway, Albany, New York for an Order: (1) compelling the Defendants to respond to Plaintiffs First and Second Discovery Request pursuant to rule 37 (3)(b)(iv) of the Federal Rules of Civil Procedure and (2) granting such other and further relief as the court deems just and proper under the circumstances.

Pursuant to Local Rule 7.1 a discovery conference on this matter was conducted on January 20, 2016 wherein the court granted leave to file this motion if Defendants failed to respond to discovery within 30 days (Docket #85).

DATED: March 3, 2016

Respectfully submitted by,

By____________S/____________

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